CITIZENS AGAINST GOVERNMENT WASTE

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November 4, 2019

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Brendan Carr
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules
GN Docket No. 18-357, 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band

Dear Chairman Pai and Commissioners Rosenworcel, O'Rielly, Starks, and Carr,

On behalf of the more than one million members and supporters of Citizens Against Government Waste, I am submitting this ex parté letter in response to the letter dated October 28, 2019, from a group of automotive safety advocates urging the commission to "preserve the 5.9 GHz band for transportation safety."

On October 21, 1999, the Federal Communications Commission (FCC) granted exclusive rights to 75 MHz of spectrum in the 5.9 GHz range for the development of dedicated short-range communications (DSRC) systems operating in the Intelligent Transportation System (ITS) radio service for vehicle-to-vehicle (V2V) communications between automobiles. The FCC's Report and Order stated that the spectrum could only be used for DSRC systems that the automotive industry had been exploring as an option to improve traffic safety.[1]

While the development of DSRC technology resulted in only limited interest by two automobile manufacturers, only one of which remains involved, many other autonomous safety innovations

[1] Federal Communications Commission, "In the Matter of Amendment of Parts 2 and 90 of the Commission's Rules to Allocate the 5.850-5.925 GHz Band to the Mobile Service for Dedicated Short-Range Communications of Intelligent Transportation Services, ET Docket No. 98-95, RM-9096," Adopted October 21, 1999, https://transition.fcc.gov/Bureaus/Engineering_Technology/Orders/1999/fcc99305.txt.

in the automotive industry have sprouted, including lane-keeping support systems; blind spot information technology; LIDAR; and automated parking systems. These technologies detect objects surrounding a vehicle and alert drivers regardless whether those objects have a radio transmitter. DSRC communicates using transponders or on-board units with other vehicles that use DSRC, and with roadside units that are also on the same spectrum to detect hazards such as a vehicle approaching a curve too quickly. DSRC can also be used to collect tolls, which is already being done with technology like EZ-Pass, as well as parking payments. However, for DSRC to be fully effective, every vehicle on the road would be required to have DSRC equipment installed on all new vehicles and as an aftermarket purchase for every other vehicle.

According to the Auto Alliance, automobile manufacturers spend more than $100 billion each year on research and development worldwide and are actively working on new safety technologies, including sensors, cameras, and radar-based systems,[2] many of which do not rely on radio communications between vehicles. The FCC should evaluate how much, if any of the 5.9 GHz band is needed for auto safety any longer, or if a reduced amount of spectrum would suffice for testing new automotive technologies. In 2008, the European Telecommunications Standards Institute allocated 30 MHz of spectrum in the 5.9 GHz band for vehicle-to-vehicle (V2V) communications.[3] This is less than half the 75 MHz of spectrum currently allocated exclusively for DSRC technology in the 5.9 GHz band in the U.S.

Because the 5.9 GHz spectrum was allocated only for DSRC technology, any other use of the spectrum, like cellular vehicle-to-everything (C-V2X), would require a rule change. DSRC is being superseded by more advanced technologies which should be reflected by the FCC's rules.

CAGW appreciates the need to reduce motor vehicle deaths using new automotive safety technology. But, this is already being done without DSRC. The best way to support the deployment of the latest automotive safety technologies and meet the need for new unlicensed wireless broadband spectrum to support critical communications at hospitals, ports, railyards, and airports (as well as in homes and offices) is for the FCC to continue its efforts to modernize the rules for the 5.9 GHz band for today's technologies.

These are among the many reasons that the FCC should review the 5.9 GHz spectrum to ensure that it is allocated to the best possible use.

Respectfully submitted,

Thomas A. Schatz
President

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[2] Auto Alliance, "Innovation," September 6, 2019, https://autoalliance.org/innovation/.
[3] European Automobile Manufacturer's Association, "ACEA Position Paper: Frequency bands for V2X," November 2018, https://www.acea.be/uploads/publications/ACEA_position_paper-Frequency_bands_for_V2X.pdf.